U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

DEC 3 2003

Mr. David E. Blair
Heritage Environmental Services
9370-E1 Lathrop Industrial Drive
Olympia, Washington 98512

Ref No: 03-0198

Dear Mr. Blair:

This is in response to your August 7, 2003 e-mail requesting clarification on the segregation requirements under § 177.848(e)(1) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180)for Division 2.3, Zone A and Zone B poisonous gases. Specifically, you ask if the absence of any hazard class or division or a blank space in the segregation table indicates that no restrictions apply to the loading, transportation, or storage of these materials.

You ask if the HMR imposes any segregation restrictions on the transportation of the following materials shipped on the same transport vehicle:

- Phosphine - Division 2.3, Zone A
- Hydrogen Sulfide - Division 2.3, Zone B
- Germane - Division 2.3, Zone B
- Nitric Oxide - Division 2.3, Zone A
- Phosgene - Division 2.3, Zone A
- Stibine - Division 2.3, Zone A
- Tungsten Hexafluoride - Division 2.3, Zone A
- Phosphorus Pentafluoride, compressed - Division 2.3, Zone B

Instructions for use of the § 177.848 Segregation Table state that "the absence of any hazard class or division or a blank space in the Table indicates that no restrictions apply" (§ 178.848(e)(1)). In addition, § 177.848(e)(6) states that segregation appropriate to the subsidiary hazard must be applied when that segregation is more restrictive than that required by the primary hazard. However,§ 177.848(e)(6) allows materials of the same hazard class to be transported together without regard to segregation required for any secondary hazard if the materials are not capable of reacting dangerously with each other and causing combustion or dangerous evolution of heat; evolution of flammable, poisonous or asphyxiant gases; or formation of corrosive or unstable materials. Therefore, since the

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177.848

materials listed above are of the same hazard class (Division 2.3), and not otherwise incompatible, they may be shipped on the same transport vehicle.

I hope this satisfies your inquiry. If you need additional assistance, do not hesitate to contact us.

Sincerely,

Susan Gorsky
Senior Transportation Regulations Specialist
Office of Hazardous Materials Standards

INFOCNTR

From: dblair@cco.net
Sent: Thursday, August 07, 2003 12:09 PM
To: INFOCNTR
Subject: Information Center Comments/Questions

Webb
§177.848
Segregation
03-0798

Below is the result of your feedback form. It was submitted by David E. Blair (dblair@cco.net) on Thursday, August 7, 2003 at 12:09:05.

Email: dblair@cco.net

Name: David E. Blair

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Comments: According to 177.848 (e) (1), "The absence of any hazard class or division or a blank in the Table indicates that no restrictions apply." In the segregation chart, there is a blank at the intersection of 2.3 Zone A gases with 2.3 Zone B gases. Does this mean that there are no restrictions applicable to the loading, transport, segregation during transportation, and/or storage incident to transportation of 2.3 Zone A gases with 2.3 Zone B gases either on the same transport vehicle or stored during transportation in the same facility?

For instance, are there any restrictions on the transportation and segregation in the same transport vehicle or storage incident to transportation of the following compressed gases in DOT specification cylinders -

Phosphine - 2.3, Zone A
Hydrogen Sulfide - 2.3, Zone B
Germane - 2.3, Zone B
Nitric Oxide - 2.3, Zone A
Phosgene - 2.3, Zone A
Stibine - 2.3, Zone A
Tungsten Hexafluoride - 2.3, Zone B
Phosphorus Pentafluoride, compressed - 2.3, Zone B

We would like to have a formal letter of interpretation on the above questions.

Please send the letter to the address given below.

Thank You for your consideration,

David E. Blair